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Attorneys for Plaintiff, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re
INTERWORKS UNLIMITED INC.,
Debtor.

EDWARD M. WOLKOWITZ, Chapter 7
Trustee for the Estate of Interworks
Unlimited Inc.,

Plaintiff,

vs.

MICHAEL KIDAKARN, KASARA
KIDAKARN, and ERIC H. LU,

Defendant's.

Case No. 2:19-bk-17990-VZ

Adv. No. 2:21-ap-01144-VZ

Chapter 7

**STIPULATION TO EXTEND DEADLINES
AND CONTINUE PRE-TRIAL CONFERENCE**

[No Hearing Required on Stipulation]

Current Pre-Trial Conference:

Date: January 22, 2026

Time: 11:00 a.m.

Place: Courtroom 1368

Proposed Continued Pre-Trial Conference:

Date: August 20, 2026

Time: 11:00 a.m.

Place: Courtroom 1368

255 E. Temple Street

Los Angeles, California 90012

TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES
BANKRUPTCY JUDGE:

This Stipulation to Extend Deadlines and Continue Pre-Trial Conference (the “Stipulation”) is entered into by and between Plaintiff Edward M. Wolkowitz, the duly-appointed and acting Chapter 7 Trustee (the “Plaintiff”) for the bankruptcy estate of Interworks Unlimited, Inc. (the “Debtor”), through his counsel of record, Levene Neale, Bender, Yoo & Golubchik L.L.P., and defendant Eric Lu (the “Defendant,” and together with the Plaintiff, the “Parties”), through his counsel, Ringstad & Sanders LLP (“Counsel”), with reference to the following facts and recitals:

RECITALS

A. On July 9, 2019, the Debtor filed a petition for relief under Chapter 7 of Title 11 of the United States Code.

B. On July 9, 2021, Plaintiff filed a complaint against the Michael and Kasara Kidakarn (the “Kidakarn Defendants”) for breach of contract, unjust enrichment, avoidance and recovery of voidable transactions, unlawful dividend, breach of fiduciary duty, corporate waste, and recovery of preference (“Complaint”), commencing the above-captioned adversary proceeding (“Adversary Proceeding”).

C. On October 8, 2021, as Dk. No. 16 in the Adversary Proceeding, Plaintiff filed an amended complaint (“Amended Complaint”) adding the Defendant as a defendant for three of the existing causes of action and adding seven additional causes of action solely against the Defendant.

D. On February 3, 2022, as Dk. No. 59, Plaintiff filed his Second Amended Complaint (“Second Amended Complaint”).

E. On March 22, 2023, as Dk. No. 104, the Court entered an order modifying the previous scheduling order and setting the following dates and deadlines:

a. All discovery must be completed by May 8, 2023, including receipt of written responses to discovery requests and filing of all expert

reports and supporting declarations;

b. The last date for pre-trial motions to be heard is June 27, 2023, except for a hearing on (1) the motion for summary judgment indicated above (July 27, 2023), (2) a motion to approve a settlement, or (3) a motion to exclude evidence at trial;

c. No later than September 7, 2023, the parties must file and serve a joint status report in which the parties explain whether the parties intend to go forward with a jury trial regarding the Kidakarn defendants, and whether the parties recommend bifurcation of a trial;

d. The Pre-Trial Conference set for April 6, 2023, at 11:00 a.m. is continued to September 21, 2023, at 11:00 a.m., at which a date for trial may be set.

F. On August 3, 2023, as Dk. No. 122, the Plaintiff and the Kidakarn Defendants entered into a stipulation (the “Kidakarn Stipulation”) to dismiss the Kidakarn Defendants. On August 17, 2023, as Dk. No. 126, the Court entered an order approving the Kidakarn Stipulation and directing the Clerk to mark this action as dismissed as against the Kidakarn Defendants and remaining pending as to the Defendant.

G. The Parties have exchanged documents pursuant to the Stipulation For Protective Order filed on June 20, 2023, as Dk. No. 108, as approved by the Court by order entered on June 22, 2023 as Dk. No. 111.

H. Thereafter, the Parties entered into a stipulation to further extend the litigation deadlines (Dk. No. 128) in light of their ongoing settlement discussions, including but not limited to discussions involving other parties represented by the same counsel in separate adversary proceedings before this Court in this bankruptcy – which prior stipulation was approved by this Court on September 8, 2023 (Dk. No. 130). This moved the litigation deadlines in this matter to the following:

- a. Discovery to be completed by October 24, 2023;
- b. New parties to be joined and pleadings amended by December 21, 2023;
- c. Pretrial motions to be heard by December 21, 2023 (except for a motion to approve settlement or exclude evidence at trial);
- d. The Pre-Trial Conference set for February 29, 2024, at 11:00 a.m.

I. Thereafter, the Parties have engaged in significant and substantive settlement discussions. The Parties once again agreed to continue the extend the litigation deadlines given the informal discovery which they were engaged in and the depth of the continuing settlement discussions. The parties agreed to extend those deadlines by stipulation (Dk. No. 133), which was approved by the Court on October 18, 2023 (Dk. No. 135).

J. By the Spring of 2024, the Parties had reached a tentative agreement to settle the case. The settlement was predicated on payments to be made to the estate, to be made over the course of twenty-four months.

K. On July 12, 2024, the Trustee filed a Notice of Settlement (Dk. No. 138).

L. Based on the Notice of Settlement and after discussion of the structure of the settlement on the record, the Court continued to the Pre-Trial Conference from August 15, 2024 to December 18, 2025 (Dk. No. 139).

M. The Court, on its own motion, then continued the Pre-Trial Conference again From December 18, 2025 to January 22, 2026. (Dk. Nos. 141, 144).

N. The Parties are still performing under the settlement agreement which they entered into. The expect to have completed their settlement over the summer of 2026. Thus, the Parties request that the Court continue the Pre-Trial Conference to August 20, 2026, in order to allow the settlement to be completed..

STIPULATION

NOW THEREFORE, the Parties stipulate and agree as follows:

1. The January 22, 2026 Pre-Trial Conference shall be continued to August 20, 2026,

1 at 11:00 a.m., or to a date thereafter that is convenient to the Court

2 2. The Parties reserve all rights with respect to the Adversary Proceeding.

3 **IT IS SO STIPULATED.**

4 RINGSTAD & SANDERS LLP

5
6 Dated: December 2, 2025

By: 

7 Todd Ringstad

8 Attorneys for Defendant, Eric Lu

9 LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

10 Dated: December 2, 2025

11 By: 

12 Joseph Rothberg

13 Attorneys for Plaintiff, Edward M. Wolkowitz,
14 Chapter 7 Trustee for the bankruptcy estate of
15 Interworks Unlimited, Inc.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation To Extend Deadlines And Continue Pre-Trial Conference** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 3, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Todd M Arnold tma@lnbyg.com
- Kurt Ramlo RamloLegal@gmail.com, kr@ecf.courtdrive.com, ramlo@recap.email
- Todd C. Ringstad becky@ringstadlaw.com, arlene@ringstadlaw.com
- Joseph M Rothberg jmr@lnbyg.com, jmr.LNBYG@ecf.inforuptcy.com
- Ashley M Teesdale ateesdale@bg.law, ecf@bg.law
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Edward M Wolkowitz emw@lnbyg.com

2. SERVED BY UNITED STATES MAIL: On (*date*) **December 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **December 3, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 3, 2025

Rebecka Merritt

/s/ Rebecka Merritt

Date

Printed Name

Signature